

Lessons Learned – 24-hour Emergency Response Telephone Number & Information

Lessons Learned Statements:

Procedures should be developed and implemented to ensure the capability of providing comprehensive emergency response and mitigation information to emergency responders in a timely manner.

The capability to provide response information should be tested on a regular schedule, at least quarterly, to ensure that notification rosters and telephone numbers are accurate and current.

Discussion of Activities:

During the evaluations which were conducted as a part of the Transportation Compliance Evaluation/Assistance Program (TCEAP) in FY 2000, deficiencies in the compliance requirements of the Hazardous Materials Regulations (HMRs) were revealed relating to the ability to provide comprehensive emergency response and mitigation information in a timely manner. The deficiencies included:

- 1) personnel answering the 24-hour telephone who were unable to provide the required information in a timely manner, were not familiar with the Emergency Response Guidebook, or were unable to connect the caller to an individual capable of providing the required comprehensive information in a timely manner;
- 2) contracting with a third party to provide 24-hour emergency response telephone number capability and to provide the required information, and failing to provide shipment specific information before offering shipments for transportation or ensuring the agency or organization can provide the comprehensive information;
- 3) failing to maintain a current notification roster of telephone numbers and/or pager numbers to be used for contacting resource personnel who can provide comprehensive shipping information; and
- 4) failing to conduct a performance test of the response system and implementation of the procedures which have been developed to operate the system on a regular schedule in order that all parties that have a role in providing required emergency response and incident mitigation information are aware of their respective responsibility and are capable of performing as required.

Analysis/Recommended Actions:

Before a hazardous materials shipment, which is not excepted from the shipping paper requirements of the HMRs or has been properly classified an ORM-D, can be offered for transportation, the shipper must provide a 24-hour emergency response telephone number for use in the event of an emergency involving the hazardous material. The telephone number must be: (1) entered on the hazardous material shipping paper in the manner

specified in applicable regulations; (2) staffed by personnel knowledgeable of the hazardous material being shipped and can provide comprehensive emergency response and incident mitigation information for the material, or has immediate access to a person who possesses such knowledge and information; and (3) monitored at all times the hazardous material is in transportation, including storage incident to transportation.

Opinion letters issued by the U.S. DOT's Research and Special Programs Administration (DOT/RSPA) indicate the information required by the provisions of 49 CFR 172.604 is more specific than the information found in the Emergency Response Guide (ERG). Comprehensive emergency response and incident mitigation information is more specific product based information and includes flash point, toxicity data, boiling point, vapor density, specific gravity, solubility, miscibility, water reactivity, flammable limits, odor, physical state (gas, liquid, or solid) and detailed medical information.

Although DOT/RSPA has not, as of the date of this document, indicated a time frame for providing the information, discussions with DOT/RSPA staff indicate the response should be immediate and will be dictated by the hazards at the accident/incident scene. The Nuclear Regulatory Commission (NRC) has indicated in guidance issued to licensees that emergency responders will expect this information to be provided within 15 minutes.

DOT/RSPA has indicated the requirement to properly staff and monitor the telephone number cannot be met by identifying a beeper number on shipping papers or utilizing other services which require a "call back." DOT does permit the answering party to connect the caller with the required person possessing material specific knowledge through a "telephone patch/bridge" in which the calling party is connected to the knowledgeable person without a return call. At no point may the call be broken.

Section 172.604(b) of the HMRs permits hazardous materials shippers to contract with third parties, such as CHEMTREC, CHEM-TEL, AND INFOTRACK, who are capable of, and accept the responsibility for, providing the detailed information, addressed above, to meet the requirements in Section 172.604(a). The regulations which permit shippers to utilize such services require the third party must be provided the information necessary to provide emergency responders comprehensive emergency and incident mitigation before offering the hazardous material for transportation. DOT/RSPA has reiterated this pre-transport information transfer and possession requirement in its opinion letters addressing this section of the HMRs.

Management should ensure that procedures have been developed and implemented to achieve compliance with the requirement to establish and maintain a 24 hour emergency response telephone number that has been staffed with personnel that are capable of providing comprehensive emergency response and incident mitigation information in a timely manner. The procedures should identify the roles and responsibilities of each participating organization, mandate the requirement for coordination between the traffic management organization or other shipping organization and the organization whose personnel actually answer the 24-hour emergency response telephone (e.g. Security, Shift Superintendent Site Emergency Management Programs and etc.), and specify the

requirement for regularly scheduled, at least quarterly, performance based testing of this capability. Transportation events involving an actual release or potential releases are significant events warranting classification as Operational Emergencies. Site Emergency Management Programs should include performance based testing involving transportation scenarios as part of the recurring site/facility drill program.

To facilitate the performance-based test, we are providing the following scenario, which can be easily modified to meet your site's needs (NOTE: The test can be made more realistic by utilizing a shipment which has actually been made by the site shipping department.):

TCEAP Emergency Response Exercise Scenario

You are the first responder to an accident involving a DOE shipment. A DOE shipment of (e.g. hazmat, ram, waste, low-level, high-level, spent fuel, etc. fill in the blank) from (site you are evaluating) was involved in a traffic accident on the outskirts of (City and State). The driver of the truck was injured and taken from the accident scene. The shipping papers have been damaged and do not have all the information required by the person making this call (first responder). As a result of the accident, one of the boxes of (Material) or the tractor trailer received damage, causing (dirt, liquid, powdery/granular residue to leak?) from the container. The shipment left the plant site at (Time and day) en route to (Name and Location of Consignee). Another tractor trailer rear-ended the trailer carrying (Commodity mentioned above) on Interstate (Portion of Selected Route), just north of the (Cross highway reference or closest exit on freeway).

Trucking Company Name: _____

Truck/Trailer Number: _____ B/L or Manifest Number: _____

Consignee: _____

What time was the call made: _____

Who answered the phone: _____

Was this call transferred? Yes No

If yes, to whom? _____

Time phone call was transferred: _____

Did the person originally answering the phone, or did the person to whom the call was transferred to, have the **comprehensive information required** in 49 CFR 172.604(a)(2)?

Yes No

What pertinent details about the accident/incident did the individual answering the phone ask for (e.g. weather conditions, injuries, road closures and duration, whether carrier has been notified, etc)? _____

Was a call-back number asked for by the individual answering the phone?

Yes No

Was the phone call terminated by the receiving party for any reason other than accidental disconnect? Yes No

Time phone call was terminated: _____

Was the exercise successful? Yes No

If no, why not: _____

General Comments: _____

References:

Hazardous Materials Regulations (49 CFR 172, Subpart G – Emergency Response Information)

DOT/RSPA Letter Opinion Issued to Mobil Chemical Company (12/28/89)

DOT/RSPA Letter Opinion Issued to Petroleum Marketers Association of America (12/28/89)

NRC Information Notice 92-62 (8/24/92)